

EXHIBIT 1



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*United States Attorney's Office
50 Main Street, Suite 1100
White Plains, New York 10606*

February 28, 2025

By E-Mail

David C. Rybicki
Rob S. Silverblatt
Michael C. Harper
K&L Gates LLP
599 Lexington Avenue
New York, New York 10022
Emails: david.rybicki@klgates.com;
rob.silverblatt@klgates.com;
michael.harper@klgates.com
(Counsel for Vadim Wolfson)

James Kousouros
260 Madison Avenue, 22nd Floor
New York, NY 10016
Email: james@kousourosllaw.com
(Counsel For Gannon Bond)

**Re: *United States v. Andrey Kostin, et al.*, S2 24 Cr. 91 (GHW)
Rule 16(a)(1)(G) Disclosure of Experts**

Dear Messrs. Rybicki, Silverblatt, Harper, and Kousouros:

Based on your request, this letter provides disclosure pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure of certain expert testimony that the Government intends to offer during its case-in-chief at trial under Rules 702, 703, and/or 705 of the Federal Rules of Evidence. Attached to this letter are the disclosures for five expert witnesses: (1) Dr. Louise Shelley, Distinguished University Professor, Schar School of Policy and Government, George Mason University, (2) FBI Supervisory Special Agent Robert J. Hanratty; (3) Alan Blake Santos, Senior Enforcement Officer, Office of Foreign Assets Control; (4) Christina Sofkos, court-certified Greek interpreter; and (5) Valentina Bren Bruzil, court-certified Russian interpreter. If you have any objections to the introduction of testimony from these expert witnesses, or questions regarding the anticipated testimony, please advise the Government promptly. The Government reserves the right to supplement this notice or call additional expert witnesses and will promptly provide notice if the Government elects to do so. The Government does not concede that the testimony of each of these witnesses is governed by Rules 702, 703, and 705, but provides this notice in an abundance of caution.

The Government reiterates its request for disclosure pursuant to Rule 16(b)(1)(A) of any item within the defendant's possession, custody, or control that the defendant intends to use in the defendant's case-in-chief, and for disclosure pursuant to Rule 16(b)(1)(B) of any results or reports of physical or mental examinations or of any scientific tests or experiments that are in the defendant's possession, custody, or control, and that the defendant intends to use in the defendant's case-in-chief or that were prepared by a witness whom the defendant intends to call at trial.

Very truly yours,

MATTHEW PODOLSKY
Acting United States Attorney

by: /s/
Emily Deininger
David Felton
Assistant United States Attorneys
(212) 637-2472 / 2299

Attachments: Disclosure as to Expert Witness Dr. Louise Shelley
Disclosure as to Expert Witness Robert J. Hanratty
Disclosure as to Expert Witness Alan Blake Santos
Disclosure as to Expert Witness Christina Sofkos
Disclosure as to Expert Witness Valentina Bren Bruzil

Disclosure as to Expert Witness Dr. Louise Shelley

I. Statement of Opinions, Bases, and Reasons

The Government expects that Dr. Louise Shelley, Distinguished University Professor Emrita, Schar School of Policy and Government, George Mason University, will testify, based on her training and experience, regarding (1) the financial activities of Russian oligarchs and other wealthy Russian citizens, including beneficial ownership of assets through offshore shell companies, intermediaries, trust and investment fund structures, and nominee owners; and (2) the ways that Russian oligarchs evade U.S. sanctions, including the use of close associates to ensure continued access and control over their assets; the use of complex ownership structures to avoid identification, and the use of third-party jurisdictions to move funds and launder proceeds to repatriate those proceeds from the U.S. and to evade detection by law enforcement. Dr. Shelley is expected to testify, in sum and substance, as follows:

Russian oligarchs and other wealthy Russian citizens typically avoid owning assets in their own name. They use a variety of methods to shield their identity and true beneficial ownership from public records associated with the asset in question. Russian oligarchs frequently use proxies or intermediaries to set up various shell companies in offshore jurisdictions, and arrange for bank accounts in the name of the shell companies to also be opened in foreign jurisdictions. The bank accounts are frequently opened in a different jurisdiction than the offshore entity that is the nominal holder of the bank account. An intermediary or close associate of the Russian oligarch typically serves as the signatory for the bank account. The shell entities are often located in jurisdictions that are tax or corporation formation havens, such as Cyprus, Malta, Luxemburg, the Cayman Islands, Belize, the Seychelles, Panama, or the British Virgin Islands. The assets are then acquired and held in the name of the shell companies.

To further conceal the identity of the true beneficial owner, the shell companies' ownership may be obscured through the use of nominee shareholders, nominee company directors, or other opaque corporate structures such as different shell companies "nestled" or "layered" on top of each other. The nominee shareholders and nominee company directors may be provided, for a fee, by an intermediary, frequently a lawyer based in an offshore jurisdiction, who sets up and helps to administer and manage the shell companies.

To obscure their connection to and control of an asset, Russian oligarchs also often use legal structures such as trusts and foundations. The trust or foundation can be used as a nominal owner of an asset or of a shell entity, thereby adding another layer of separation between the asset and the Russian oligarch. Typically, the Russian oligarch or his family members would be named as the beneficiaries of such trusts and foundations. These legal structures can be organized pursuant to the laws of offshore jurisdictions that are tax or corporation formation havens, including the locations discussed above.

Russian oligarchs and other high-wealth Russian citizens avoid owning assets in their own name for several reasons. They may wish to circumvent tax or disclosure obligations; avoid public connection between themselves and an asset (e.g., to avoid public reporting regarding wealth held

abroad or to avoid having their name connected to an asset being used by a mistress); avoid issues relating to potential corporate raids, including the potential seizure of assets by the Russian government or politically-connected individuals should an oligarch fall out of favor; and, since at least in or about 2014, to evade sanctions that have been imposed by the United States, the European Union, and Canada. In anticipation of U.S. sanctions, in at least in or about 2014, in connection with the Russian invasion and annexation of the Crimean Peninsula, some Russian oligarchs took steps to conceal and protect their ownership of assets with a nexus to the United States, including by transferring the assets to different shell entities, legal structures, or close associates.

Russian oligarchs generally conceal any change of ownership or sale of assets by using complex financial transactions involving the shell entities and legal structures that are the nominal owners of the assets. They may also transfer nominal ownership of an asset between shell entities or legal structures for asset management purposes even when there is no change in their true beneficial ownership of and control over the asset. One method of disguising the nature of asset transfers includes using purported loans between various entities to disguise the true origin of and purposes for a transfer of money. Fake invoices may also be used to create a purported rationale for a transaction and disguise the illicit origins of proceeds.

Dr. Shelley's testimony will be based on her education and experience, including her more than 40 years as a university professor studying Russian society, corruption, and organized crime. Dr. Shelley has spent a considerable time in Russia and speaks fluent Russian. From 1997 through 2014, Dr. Shelley was involved in managing Russian organized crime study centers in Eastern Europe, which required her to frequently travel to Russia. She has lectured internationally and published on illicit economy, corruption and transnational crime and oligarchs, including in the Russian language. Dr. Shelley has also provided consulting services on legal cases involving Russian oligarchs that required her to review and analyze the financial records and corporate and legal structures used by those oligarchs. Her background and expertise have qualified her to testify before Congress on several occasions. As noted above, Dr. Shelley currently serves as a Distinguished University Professor Emerita, Schar School of Policy and Government, George Mason University. In the course of the aforementioned experience, Dr. Shelley has become familiar with the subject matter of her prepared testimony as detailed above.

Other than as specifically described above, Dr. Shelley will not be asked to opine about the specific facts of this case.

II. Qualifications

Dr. Louise Shelley's qualifications and publications are contained in her *curriculum vitae*, attached hereto as Exhibit A.

III. List of Cases

A list of cases, to the best of Dr. Shelley's recollection, in which, during the previous four years, she has testified as an expert at trial or by deposition is attached hereto as Exhibit B.

Date: February 24 2025

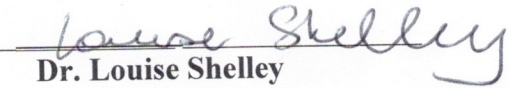

Dr. Louise Shelley

EXHIBIT A

DR. LOUISE I. SHELLEY
4538 Cathedral Avenue, N.W.
Washington, D.C. 20016
Tel: 202-244-0966; Fax: 202-244-6325
February 2025

PERSONAL INFORMATION

Office Address: Schar School of Policy and Government
George Mason University
3351 Fairfax Drive, MS 3B1 Rm. 712
Founders Building
Arlington, VA 22201
E-mail: Lshelley@gmu.edu

EDUCATION:

Ph.D., Sociology, University of Pennsylvania, Sociology (1977)

Criminal Law Department, Moscow State University (1974-75)

Columbia University, International Research and Exchanges Board (IREX) Fellowship used to study in the Sociology Department, Law School and the Russian Institute (1973-74)

M.A., University of Pennsylvania, Criminology (1973)

B.A., Cum Laude, Cornell University, Penology and Russian Literature (1972)

EMPLOYMENT HISTORY

February 2025-- Omer L. and Nancy Hirst Endowed Chair for civic intellectual emerita,
Distinguished University Professor, Emerita

January 2015- Feb.2025 Omer L. and Nancy Hirst Endowed Chair for civic intellectual, Affiliate
appointment with SEOR (Systems Engineering and Operations Research), Volgenau School
from 2021

January 2011- University Professor, School of Public Policy, George Mason University
Fiunder and Director, Terrorism, Transnational Crime and Corruption Center

August 2007 – Professor, School of Public Policy, George Mason University
Founder and Director, Terrorism, Transnational Crime and Corruption Center

The American University:

2004 – Aug. 2007 *Professor*, School of International Service
(primary appointment)
Professor, Department of Justice, Law and Society, School of Public Affairs

1997-present *Director*, Transnational Crime and Corruption Center

1986-2004 *Professor*, Department of Justice, Law and Society, School of Public Affairs
(primary appointment)
Professor, School of International Service

1989-1992 *Chair*, Department of Justice, Law and Society, School of Public Affairs
Professor, School of International Service

1982-1986 *Associate Professor*, School of Justice and School of International Service

1981-1982 *Associate Professor*, School of Justice

1977-1981 *Assistant Professor*, School of Justice

June 1978- *IPA Social Science Program Specialist*. Helped to formulate LEAA's correctional
January 1979 policy and review its funding in the area. Office of Planning and Management, Law
Enforcement Assistance Administration

Visiting Professorships

Institute of Sociology, University of Oaxaca, Fall 1993, (lecturing in Spanish), Fulbright
lectureship

Law Faculty, University of Trento, Spring 1993 (lecturing in Italian)

Institute of Penal Sciences, Mexico City, Spring 1993 (lecturing in Spanish)

HONORS AND AWARDS (NOT UNIVERSITY)

Part of North American winning team on Trademarks for the protection of consumer safety during
the pandemic, 2021, <https://www.worldtrademarkreview.com/article/collaboration-and-consumer-safety-insights-3m-wtrs-2021-north-america-team-of-the-year>

Rockefeller Foundation grant for Bellagio Center Residence October –November 2016

Inaugural Andrew Carnegie Fellow (2015-2017)

U.S. Department of State, Speaker and Specialist Grant, discussion of Dirty Entanglements: Corruption, Crime and Terrorism, France, March 2015.

Gerhard Mueller Prize for contributions to international criminal justice, Academy of Criminal Justice Sciences, 2013

Distinguished Scholar Award, International Association for the Study of Organized Crime, November 2012

U.S. Department of State, Speaker Grant, Human Trafficking, Iceland, February 2011

U.S. Department of State, Speaker and Specialist Grant, Corruption, Kyrgyzstan, September 2009

U.S. Department of State, Speaker and Specialist Grant, Human trafficking, smuggling and border issues, Tajikistan, September 2006

U.S. Department of State, (ECA) Speaker and Specialist Grant, Anti-Corruption Program, Honduras, April 2001

U.S. Department of State, (USIA) Speaker and Specialist Grant, Anti-Corruption Program, Argentina, September 2000

USIA Academic Specialist Grants to work with Mahidol University, Thailand on Ph.D. in Criminology, 1992 and 1995, Established curriculum for PHD and served on advisory board of doctoral program

Fulbright Lecturing Fellowship to Mexico, 1993-1994

IREX U.S.S.R. Academy of Sciences/ACLS Exchange, 1988-89

IREX Development Fellowship, 1987-88

IREX Short-Term USSR Academy of Sciences/ACLS Exchange, 1987-88

Kennan Institute Research Grant, Wilson Center, Smithsonian Institution, Spring 1986

John Simon Guggenheim Fellowship, 1984-85

National Endowment for the Humanities Summer Stipend, 1984

IREX Graduate Student and Young Professors' Exchange to Poland and Bulgaria, Grant for Summer 1982 (withdrew because of Polish political situation)

American Sociological Association grant to present paper at World Congress of Sociology, 1978

Fulbright-Hayes Fellowship, 1974-75, for Study at the Institute of Criminology, Cambridge University, in France and at the Criminal Law Department, Moscow State University, USSR

IREX Graduate Student and Young Professors' Exchange to the USSR, 1974-75

Slavic Honor Society

American Criminology Society Student Writing Competition Award, 1975
International Fellows Program, Columbia University, 1973-74

IREX Preparatory Fellowship, 1973-74

Teaching Fellowship, University of Pennsylvania, 1972-73

UNIVERSITY AWARDS

Earle C Williams Presidential Medal for Faculty Excellence in Social Impact, 2022

George Mason University, School of Policy, Government and International Affairs, Scholar Award, 2015

American University School of Public Affairs: Outstanding Scholarship, Research and Other Professional Contributions, 1999

The American University Scholar/Teacher of the Year Award, 1991-92

American University Scholar of the Year Award, 1985

College of Public and International Affairs Outstanding Scholar Award, 1985

School of Justice Outstanding Scholar Award, 1985

University Summer Research Grant, 1984

School of Justice Outstanding Service Award, 1984

College of Public and International Affairs Outstanding Scholar Award, 1982

School of Justice Outstanding Scholar Award, 1982

CONTRACTS AND GRANTS

PI, Anti-Corruption Defenders Project for Northern Central America, September 2022-September 2024 (PI)--\$4 million

PI, CINA/Illicit gold and counterfeits from Peru and Columbia, CINA-DHS supported, 9/1/21-12/31/2022 \$212,000

NSF, PI, with Edward Huang, co-PI D-ISN: TRACK 1: Collaborative Research: An Interdisciplinary Approach to Understanding, Modeling, and Disrupting Drug and Counterfeit Illicit Supply Chains, October 1, 2020-September 30, 2025, \$649,000, supplements \$250,000

Department of State, Counter-Terrorism Statistical Annual Reporting subcontract to DSG, PI for GMU, 2018-25, (approx. \$5 million)

USAID, Targeting Natural Resource Corruption (subcontract to WWF), PI for GMU, 2018-2021, (approx. \$270,000)

NSF Eager Grant, PI (with Edward Huang, co-PI), EAGER: ISN: A New Multi-Layered Network Approach for Improving the Detection of Human Trafficking. Illicit supply chain program, September 2018- August 2022, (approx. \$296,000)

DHS/CINA: Human Trafficking Hubs, 2017-2018, PI, \$150,000

Department of State, Research and Training on Illicit Markets for Iraqi and Syrian Art and Antiquities Total \$399,984, September 2017 – January 2019

USAID, Counter wildlife trafficking and ivory poaching in Tanzania grant of \$198,000, 2016 (co-principal investigator)

US State Department, Time to Take Action: Working Globally to Identify and Counter the TOC Networks behind Rhino Poaching, October 1, 2014-September 30, 2015, \$367,000

Woodtiger Foundation for work on illicit wildlife trade March, 2014 \$110,000

WWF South Africa, work to counter poaching in rhinos, \$140,000 (first phase), May 2014

MacArthur Foundation, for, “Combating Criminal Involvement in Nuclear Trafficking, “ (with Professor Orde Kittrie of Arizona State University), \$185,000, 2013-2014.

Jacobs Technology, Analysis of Illicit Trafficking in Central Asia, 8/2/2010-7/31/2011 \$553,919

DTRA, Managing Non-Traditional Challenges \$43,987.00 12/2009-3/2010

United States Department of Justice, USAID and U.S. Department of State grants: Russian Organized Crime Study Centers, approx. \$5,000,000 (1997- May 2014)

Open World Leadership Program, 2003-2010, Programs with Russia, Ukraine, Tajikistan and Kyrgyzstan (approx. \$600,000)

United States Department of Energy: The Threat to Russia's Nuclear Materials: Case Study of Novosibirsk, \$350,850 (12/07/05-12/31/06)

United States Department of State: Human Trafficking Awareness for Local Government Officials and Law Enforcement, 250,000 (9/01/05-2/28/07)

International Research and Exchange Board: Smuggling Links between Terrorist and Organized Crime Groups in Eurasia, \$30,000 (8/01/2005-7/30/2006)

Ploughshares Fund: Nuclear Smuggling Links between Terrorist and Organized Crime Groups in Eurasia, \$25,000 (10/17/05-10/17/06)

Open World Leadership Program: Exploring Economic Reform and Development, \$65,285 (7/1/05-12/31/05)

United States Department of Energy: Organized Crime, Corruption and Nuclear Proliferation in Dagestan and Chelyabinsk, \$260,000 (9/1/04-6/30/05)

United States Department of Justice and U.S. Department of State grants: Ukrainian Organized Crime Study Centers, approx. \$1,000,000 (1997-2005)

United States Department of Justice and U.S. Department of State grants Organized Crime Study Centers in Georgia, approx. \$1,000,000 (ongoing 2002-2006)

United States Department of Justice and U.S. Department of State grants: Research on Money Laundering in Georgia, approx. \$350,000 (ongoing 2002-2005)

Open World Leadership Program: Exploring Economic Reform and Development, \$90,024 (5/1/04-12/31/04)

National Institute of Justice: Links Between Organized Crime and Terrorism, \$235,810 (9/1/03-2/28/05)

Open World Leadership Program: Exploring Economic Reform and Development, \$160,338 (6/1/03-12/31/03)

IREX/Starr Family Foundation: Black Sea Grant, Corruption in Higher Education, 2002-2003

U.S. Library of Congress Open World Russian Leadership Program: Exploring Economic Reform and Development, \$119,915 (7/1/02-11/30/02)

U.S. Border Patrol Academy (Vertex Solutions): Curriculum Design and Technical Implementation, \$140,000 (10/1/02-12/31/04)

McCormick Tribune Foundation: Cantigny Conference on Transnational Organized Crime and Peacekeeping; \$10,000 (9/1/01-10/20/01)

World Bank: Russian Case Study of Project of Criminal and Civil Violence, \$20,000

U.S. State Department Bureau of International Narcotics and Law Enforcement Grant: To Develop a Model Course Curricula for Use in Law Enforcement Training in the Prevention, Enforcement, and Prosecution of Human Trafficking Crimes, and Protection and Rehabilitation of Victims, \$347,000 (1999-2000)

U.S. State Department (*former USIA*) Grant for Trafficking in Human Beings Research in Russia and Ukraine, approx. \$120,000 (1999-2000)

U.S. Department of Justice, USAID and U.S. Department of State grant: Research on Money Laundering in Russia, \$247,000 (1997-2002)

MacArthur Foundation: Organized Crime Study Centers in Russia, approx. \$100,000 (1995-1997)

National Council for Soviet and East European Research, 1992-93 (The Soviet Coup Trial), 1986-87 (Policing Soviet Society) and 1980-81 (Lawyers in Soviet Work Life)

American Bar Association Commission on Undergraduate Legal Studies: Grant to develop a General Education Course on Western Legal Tradition (7 out of 80 proposals funded), 1992

LANGUAGES

Fluent in French, Russian, and moderate fluency in Spanish and Italian

PROFESSIONAL MEMBERSHIPS

Professional Societies:

American Sociological Association, American Society of Criminology, American Association for Slavic, East European, & Eurasian Studies

Advisor to Conseil Supérieur de la Formation et de la Recherche Stratégiques (Paris, France)

Council on Foreign Relations

EDITORIAL OFFICES

Editorial Board, *Russian Law*, 2005-2015

Editorial Board, *Demokratizatsiya: The Journal of Post-Soviet Democratization*, co-editor in chief. 1992-2000

Editorial Board, *Journal of Human Trafficking*, 2015 to now

Scientific Board, *Power Institutions in Post-Soviet Societies*, 2004 -2012

Editorial Board, *European Journal on Criminal Policy and Research*, 2003 -2019

Editorial Board, *Global Crime*, 2004 -2010

Co-Editor, *Trends in Organized Crime*, 1995-2001.

Editorial Board, *Transnational Organized Crime*, 1995-2004

Editorial Board, *International Annals of Criminology*, 1983-2000

Advisory Board, Law and Justice Journal, Queensland University of Technology, 2003-14

Associate Editor for North America, *International Annals of Criminology*, 1986-2010

Associate Editor, *Justice Quarterly*, 1983-87

Editorial Consultant, *Journal of Criminal Law and Criminology*, 1982-2010

Editorial Board, *International Criminal Justice Review*

PROFESSIONAL OFFICES AND ACTIVITIES

CINA (Criminal Investigations and Network Analysis), A DHS (Department of Human Security) Center of Excellence at George Mason University, Member of Scientific Committee, 2017-to present

Member of the Institute for a Sustainable Earth, George Mason University

Co-Moderator/Convenor of the Anti-Corruption Advocacy Network (approx. 1000 members), 2016 to the present

Member of the Advisory Board, Strategic Studies, CNAM, Conservatoire national des arts & métiers, Paris, France

Economies of Violence Project, CNAM, 2020 -2022

Vice-President, FITS, International Forum on Technology and Security, 2015 -17

Human Trafficking group, Illicit Trade Task Force of the OECD, 2013-18

Co-chair, Human Trafficking working groups, Global Agenda Councils, World Economic Forum, 2013-2015

Member, Global Initiative on Transnational Organized Crime, 2013 on

Member, Council on Foreign Relations, 2012 on

Co-Chair, Global Agenda Council on Organized Crime, World Economic Forum, 2010-2011

Global Agenda Council on Organized Crime, World Economic Forum 2010 to 2014

Global Agenda Council on Illicit Trade, World Economic Forum 2008 -2010

Advisory Board, Istanbul Conference on Democracy and Global Security, 2005, 2007

Book Award Committee, Law and Society Association, 2006

Scientific Commission, International Society of Criminology, 2006-2010.

Sellin-Glueck Award Committee of the American Society of Criminology, 2005-2006

Program Committee, Academy of Criminal Justice Sciences, 2003

Board of Directors, International Society of Criminology (ISC), 2000-05

Program Committee, American Society of Criminology, 2000

Fulbright Selection Committee for the Discipline of Criminology, 1995-98

Chair, Research Committee No. 29 for Deviance and Social Control, International Sociological Association, 1990-94

Board Member, American Association for the Advancement of Slavic Studies (AAASS); (ASA Representative), 1987-90

Program Committee, AAASS 1990 Annual Meeting

First Vice-President, Research Committee for Deviance and Social Control, ISA, 1986-90

Board Member, Research Committee for Deviance and Social Control, ISA, 1985-94

America's Award Committee, American Sociological Association, 1988-1992

Board of Directors, International Division, ASC, 1985-1990

Secretary, Eastern Sociological Society, 1986-89

Program Committee, American Society of Criminology (ASC), 1985 and 1994 Annual Meetings

Local Arrangements Committee, World Congress of Slavic Studies, 1985

Chair, Division of International Criminology, ASC, 1983-85

Newsletter editor, Division of International Criminology, ASC, 1985-87

Secretary, International Division, ASC, 1981-83

International Liaison Committee, ASC, 1979-80

Local Arrangements Committee, ASC, National Meeting, 1981

Local Arrangements Committee, AAASS, National Meeting, 1982

CONSULTING EXPERIENCE

Consulting on legal cases involving litigation concerning organized crime issues, corruption, corporate raiding, transnational crime, asylum cases, reviews of research on transnational crime, expert witness on asylum cases

EXPERT TESTIMONY

Testified before the House Committee on Science, Space and Technology in a virtual hearing entitled, Data Challenges Impacting Human Trafficking Research and Development of Anti-Trafficking Technology Tools, Feb. 8, 2022, <https://science.house.gov/hearings/data-challenges-impacting-human-trafficking-research-and-development-of-anti-trafficking-technological-tools>.

Testified before the House Financial Services Committee in a virtual hearing entitled, "Ending Exploitation: How the Financial System Can Work to Dismantle the Business of Human Trafficking, March 23, 2021;
<https://financialservices.house.gov/calendar/eventsingle.aspx?EventID=402072>

Spoke at George Mason University and Representative David Trone, Congressional Staff Luncheon Briefing on International Fentanyl Trafficking, January 13, 2020.

Participated in Roundtable discussion, Armed Conflict and Women, CFR briefing for Congressional staff on human trafficking and conflict, July 10, 2019.

Spoke at Congressional briefing, National Security Briefing: “Natural Security: The Role of Global Conservation in Protecting U.S. Interests,” Rayburn Building, Feb 28, 2019.

Spoke at Congressional briefing, National Security Briefing: “Natural Security: The Role of Global Conservation in Protecting U.S. Interests,” Dirksen Building, July 25, 2018.

Testified before the Commission on Security and Cooperation in Europe (the Helsinki Commission), *The Opioid Crisis and the Dark Web: How Transnational Criminals Devastate U.S. Communities*, March 28, 2018, <https://www.csce.gov/international-impact/events/opioid-crisis-and-dark-web>.

Testified before the Terrorism and Illicit Finance Subcommittee of the House Financial Services Committee at the hearing “Exploring the Financial Nexus of Terrorism, Drug Trafficking and Organized Crime,” March 20, 2018, <https://financialservices.house.gov/calendar/eventsingle.aspx?EventID=403234> (for video and statement)

Testified before the Subcommittee on Oversight and Investigation, House Financial Services Committee, *Human Trafficking and U.S. Financial Markets*, Jan. 30, 2018, <https://financialservices.house.gov/calendar/eventsingle.aspx?EventID=402952> (for video and statement).

Testified before the Commission on Security and Cooperation in Europe (the Helsinki Commission), *“A Hazy Crisis: Illicit Cigarette Smuggling in the OSCE Region,”* July 19, 2017, <https://www.youtube.com/watch?v=HK8U8z9xZOk>.

Testified before the Counterterrorism and Intelligence Subcommittee, Homeland Security Committee, *Following the Money: Examining Current Terrorist Financing Trends and the Threat to the Homeland*, May 12, 2016.

Testified before Task Force to Investigate Terrorism Financing, *“Could America Do More? An Examination of U.S. Efforts to Stop the Financing of Terror”* September 9, 2015.

Testified before the United States Senate’s Committee on Foreign Relations, Subcommittee on European Affairs, on *Combating Transnational Crime and Corruption in Europe*, October 30, 2003.

Testified before the House Committee on International Relations, Subcommittee on International Terrorism, Nonproliferation and Human Rights on *Human Trafficking: Transnational Crime and Links with Terrorism*, June 25, 2003.

Testified before the U.S. House of Representatives' Committee on Banking and Financial Services on *Money Laundering/Transnational Financial Crime and Corruption: A High Priority for the 21st Century*, September 21, 1999.

Testified before the Commission on Security and Cooperation in Europe (the Helsinki Commission) on *Corruption in the Former Soviet Union*, July 21, 1999.

Testified before the Commission on Security and Cooperation in Europe (the Helsinki Commission) on *Sex Trade: Trafficking of Women and Children in Europe and the United States*, June 28, 1999.

Testified before the U.S. House of Representatives' International Relations Committee on *The Threat of International Organized Crime and Global Terrorism*, October 1, 1997.

Testified before the U.S. House of Representatives' International Relations Committee on *The Threat of Russian Organized Crime*, April 30, 1996.

Testified before the Committee on Security and Cooperation in Europe on *Corruption and Crime in the Former Soviet Union*, June 10, 1994.

Testified before the Mexico City Legislature at its forum on *Victimology*, December 11, 1993.

Testified with a Supreme Soviet Delegation before the Commission on Security and Cooperation in Europe (the Helsinki Commission) on *The New and Improved Supreme Soviet and the Institutionalization of Human Rights Reform*, November 28, 1989.

Testified before the Commission on Security and Cooperation in Europe (the Helsinki Commission) on *The Implementation of the Helsinki Accords: A Changing Soviet Society*, May 17, 1989.

Testified before U.S. House of Representatives' Foreign Affairs Committee Subcommittee on *Europe and the Middle East*, March 1988, and Subcommittee on Human Rights, May 1988.

PUBLICATIONS

Books and Monographs

Antiquities Smuggling in the Real and Virtual World, ed. With Layla Hashemi (Routledge, 2022).

Dark Commerce: How a New Illicit Economy Is Threatening Our Future
Princeton University Press, 2018, paperback edition in 2020; edition in Chinese Taipei: Linking, 2023.

Dirty Entanglements: Corruption, Crime and Terrorism Cambridge University Press, 2014.

Human Security, Transnational Crime and Human Trafficking: Asian and Western Perspectives
(edited with Shiro Okubo), London and New York: Routledge, 2011, released in paperback 2013.

Human Trafficking: A Global Perspective New York and Cambridge: Cambridge University Press, 2010 (under contract with Cambridge for a revised edition)

Organised Crime and Corruption in Georgia edited with Erik R. Scott and Anthony Latta ,
London and New York: Routledge, 2007.

Human Traffic and Transnational Crime: Eurasian and American Perspectives edited with Sally Stoecker Lanham, Md: Rowman and Littlefield, 2004.

Izucheniye organizovannoy prestupnosti: rossiisko-amerikanskii dialog, edited with Ninel Kuznetsova and Yu. G. Kozlov, Moscow: Olimp, 1997.

Policing Soviet Society: The Evolution of State Control, London: Routledge, 1996.

Social Changes, Crime and the Police, edited with Jozsef Vigh Reading: Harwood Press, 1995,
Reissued 2023 by Routledge Library Editions: Police and Policing.

Crime and Control in Comparative Perspective, edited with H.G. Heiland and H. Katoh. Berlin:
Walter de Gruyter, 1992.

Crime and Development (edited special issue), International Annals of Criminology, 1986, Vol.
24, Nos. 1 and 2.

Lawyers in Soviet Work Life, Law, Crime and Deviance Series, Rutgers University Press, 1984.

Crime and Modernization, The Impact of Industrialization and Urbanization on Crime, Southern
Illinois University Press, first printing, March 1981, second printing, March 1982. Translated into
Chinese, published Beijing: Public Publishing House, 1987.

Readings in Comparative Criminology, Southern Illinois University Press, 1981 (edited
Collection).

History Without Jews, B'Nai B'rith, 1977.

Articles

“Modelling and Disrupting Counterfeit N95 Respirator Supply Chains,” with Edward and Layla Hashemi in *Advanced Engineering Informatics*, Vol.64, March 25, 2025, doi;103084.

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LECTURES

American Security Project, Atlantic Council, Boston University, Bundestag (Germany), Carnegie Endowment, CERI (France), Chatham House, CNAM (Conservatoire national des arts & métiers), Columbia University, Cornell University, Council of Foreign Relations-Germany,

CSIR-South Africa, CSFRS (Conseil Supérieur de la Formation et de la Recherche Stratégiques), Dartmouth College, DCAF (Geneva), Duke University, Duke University Law School, Far East State University (Vladivostok), Fondation Maison des Sciences de l'homme, Foreign Service Institute, Franklin and Marshall, Georgetown University, George Washington University, German Council on Foreign Relations, Grinnell College, University of Groningen, Hacettepe University, Russian Research Center and Kennedy School of Government, Harvard University, Haute Ecole-Arc (Switzerland), Hebrew University, Instituto de Ciencias Penales -- Mexico (in Spanish), Hertie School of Governance, Indiana University—Bloomington, Institute of Sociological Research -- Moscow (in Russian), Institute of Philosophy and Law -- Vilnius, Johns Hopkins University (SAIS and main campus), IISS, Italian Senate, John Marshall Law School, Kansas State, Kennan Institute, University of Kiel (Germany), University of Leiden, Mahidol University (Thailand), Marshall Center—Garmisch (Germany), Michigan State University, National Autonomous University of Mexico (UNAM), Monterey Institute of International Studies, Moscow State University (in Russian), Munich Security Conference, NATO, NATO Defence College Foundation, National Intelligence University, National War College, New York University, OECD, Organization of Security and Cooperation in Europe (OSCE), Universidad de La Salle (Mexico City), Università di Pavia, Princeton University, Ritsumeikan University (Japan), Sciences Po (Paris), Shandong University, Southern Methodist University, Stanford University, Swiss Technical University, Tbilisi State University, Tel Aviv University, Transparency International, Trinity College-Dublin, Tufts University, University of California -- Berkeley, Università di Trento, University of Capetown, University of Chicago, Universidad de los Andes (in Spanish), Université Libre de Bruxelles (in French), University of Groningen (Netherlands), University of Kansas, University of Kentucky, University of Macao, University of Maryland, University of Michigan, Université de Nanterre, University of Nebraska, University of North Carolina--Chapel Hill and Pembroke, Università di Palermo, University of Pennsylvania, University of Richmond, Transparency International, Tufts University, University of Sao Paulo, University of Paris II, University of Peace (Costa Rica); University of Sarajevo, University of Tokyo, University of Toronto, University of Twente (Netherlands), Universidad de la Paz (Costa Rica), University of Uppsala, University of Virginia, University of Wisconsin, Wooster College, Yale University, York University.

Community Involvement:

Steering Committee, Washington Wine and Cheese Society

Board, International Hajji Baba Society

EXHIBIT B

LIST OF CASES

Date	Case	Court
December 2024	U.S. v. Tavberidze, 23 Cr. 585 (JSR)	S.D.N.Y.
March 2021	New Stream Trading AG v. JSC Antipinsky Refinery, et al., Case No. 194472	London Court of International Arbitraton
November 2024	Carlyle Aviation Partners, LLC v. American International Group UK Ltd., No. 2022-020857-CA-01	Circuit Court of the Eleventh Judicial Circuit, Miami Dade County, Florida
November 2024	Avmax Aircraft Leasing, Inc. v. HDI Global Specialty SE – UK, et al., No. 2023-020901- CA-01	Circuit Court of the Eleventh Judicial Circuit, Miami Dade County, Florida

Disclosure as to Expert Witness Robert Hanratty

I. Statement of Opinions, Bases, and Reasons

The Government intends to call FBI Supervisory Special Agent (“FBI/SSA”) Robert J. Hanratty as an expert in Eurasian organized crime, and more specifically, (1) the ways Russian oligarchs hide their financial assets, including through layers of offshore shell companies, intermediaries, trust and investment fund structures; and nominee owners; and (2) the ways Russian oligarchs maintain control over their assets, including naming close associates or relatives as beneficiaries of bank accounts or trust structures. FBI/SSA Hanratty is expected to testify, in sum and substance, as follows:

Russian oligarchs and other wealthy Russian citizens typically avoid owning assets in their own name. They use a variety of methods to shield their identity and true beneficial ownership from public records associated with the asset in question. Russian oligarchs frequently use proxies or intermediaries to set up various shell companies in offshore jurisdictions, and arrange for bank accounts in the name of the shell companies to also be opened in foreign jurisdictions. The bank accounts are frequently opened in a different jurisdiction than the offshore entity that is the nominal holder of the bank account. An intermediary or close associate of the Russian oligarch typically serves as the signatory for the bank account. The shell entities are often located in jurisdictions that are tax or corporation formation havens, such as Cyprus, Malta, Luxemburg, the Cayman Islands, Belize, the Seychelles, Panama, or the British Virgin Islands. The assets are then acquired and held in the name of the shell companies.

To further conceal the identity of the true beneficial owner, the shell companies’ ownership may be obscured through the use of nominee shareholders, nominee company directors, or other opaque corporate structures such as different shell companies layered on top of each other. The nominee shareholders and nominee company directors may be provided, for a fee, by an intermediary, frequently a lawyer based in an offshore jurisdiction, who sets up and helps to administer and manage the shell companies.

To obscure their connection to and control of an asset, Russian oligarchs also often use legal structures such as trusts and foundations. The trust or foundation can be used as a nominal owner of an asset or of a shell entity, thereby adding another layer of separation between the asset and the Russian oligarch. Typically, the Russian oligarch or his family members would be named as the beneficiaries of such trusts and foundations. These legal structures can be organized pursuant to the laws of offshore jurisdictions that are tax or corporation formation havens, including the locations discussed above.

Russian oligarchs and other high-wealth Russian citizens avoid owning assets in their own name for several reasons. They may wish to circumvent tax or disclosure obligations; avoid public connection between themselves and an asset (e.g., to avoid public reporting regarding wealth held abroad or to avoid having their name connected to an asset being used by a mistress); avoid issues relating to potential corporate raids, including the potential seizure of assets by the Russian government or politically-connected individuals should an oligarch fall out of favor; and, since at

least in or about 2014, to evade sanctions that have been imposed by the United States, the European Union, and Canada. In anticipation of U.S. sanctions, in at least in or about 2014 and in or about 2018, in connection with the Russian invasion and annexation of the Crimean Peninsula and the Russia-Ukraine war, some Russian oligarchs took steps to conceal and protect their ownership of assets with a nexus to the United States, including by transferring the assets to different shell entities, legal structures, or close associates.

Russian oligarchs generally conceal any change of ownership or sale of assets by using complex financial transactions involving the shell entities and legal structures that are the nominal owners of the assets. They may also transfer nominal ownership of an asset between shell entities or legal structures for asset management purposes even when there is no change in their true beneficial ownership of and control over the asset. One method of disguising the nature of asset transfers includes using purported loans between various entities to disguise the true origin of and purposes for a transfer of money. Fake invoices may also be used to create a purported rationale for a transaction and disguise the illicit origins of proceeds.

FBI/SSA Hanratty's testimony and opinions will be based on his training, education, and experience. Since approximately 2011, he has investigated criminal matters relating to Eurasian organized crime, both as a Special Agent and Supervisory Special Agent, and has worked on or supervised numerous cases involving the former Soviet Republics, including Russia. FBI/SSA Hanratty has participated in more than 50 money laundering investigations, and has actively worked at least 20 criminal enterprise investigations, involving over 200 targets. At least half of those 20 were Russian-related investigations. He has conducted investigations into criminal enterprises tied to people from the former Soviet Union, including through conducting surveillance, reviewing records, participating in Title IIIs and other electronic surveillance techniques. His work has also required analyzing financial records for Russian organized crime networks. His work has included, among other things, dealing directly with cooperators, including Russian cooperators, confidential informants (CIs) and sources, and securing bank records from foreign financial institutions. He has directly debriefed at least 50 sources and witnesses related to Eurasian organized crime.

Through his work, FBI/SSA Hanratty also has become familiar with the international banking system and has participated in Mutual Legal Assistance Treaty requests for financial information from foreign countries, including Cyprus. He has reviewed financial documents from more than 500 bank accounts.

II. Qualifications

Mr. Hanratty's qualifications are contained in his *curriculum vitae*, attached hereto as Exhibit C. He has not authorized any publications in the last ten years.

III. List of Cases

Mr. Hanratty has not testified as an expert in the last four years.

Date: February 27, 2025

/s/ Robert Hanratty

Robert Hanratty

EXHIBIT C

ROBERT J. HANRATTY

rjhanratty@fbi.gov | 646-438-2035 | 11 Centre Place, Newark, NJ 07102

Summary

FBI Supervisory Special Agent experienced in complex transnational criminal investigations leading three transnational organized crime task forces in the Newark Field Office. Results oriented leader with strong liaison skills and extensive investigative and management experience. Exceptional planning and execution skills.

FBI Experience

Supervisory Senior Resident Agent

Jersey Shore Gang and Criminal Organization Task Force
August 2024- Present

Red Bank Resident Agency, Squad 2
Criminal Enterprise Branch, Newark Division

Led as squad supervisor consisting of six Special Agents, twelve Task Forces Officers and three Intelligence Personnel and served as Senior Supervisor for the FBI's Newark's Satellite office covering all criminal threats in Monmouth and Ocean Counties in New Jersey. Provided direction on 117 investigations covering violent crime, gang, major theft, and transnational organized crime investigations. Managed partnerships with over 65 Police Chiefs and Prosecutors from Monmouth and Ocean counties.

Supervisory Special Agent

Transnational Organized Crime Eastern Hemisphere Task Force
May 2021-August 2024

Squad CE-14
Criminal Enterprise Branch, Newark Division

Led as squad supervisor consisting of 13 Special Agents, nine Task Forces Officers and five Intelligence Personnel and served as Program Coordinator for Transnational Organized Crime (TOC)-East Hemisphere Threat. Provided direction on 119 investigations covering eight TOC-East sub-threats, targeting complex TOC actors engaged in sophisticated criminal activity, resulting in three consecutive years of high-performance ratings from FBI Headquarters.

Supervisory Special Agent

Transnational Organized Crime Western Hemisphere Task Force
June 2020- May 2021

Squad CE-6
Criminal Enterprise Branch, Newark Division

Led as squad supervisor consisting of eight Special Agents, five Task Force Officers and three Intelligence Personnel. Served as OCDETF Coordinator and TOC Western Hemisphere Program Coordinator for Newark Division. Exceeded all FY21 threat measures, including 24 arrests, resulting in a high-performance rating from FBI Headquarters. Directed a new investigation targeting a RPOT and NJ-based Sinaloa Cartel subjects, resulting in the arrest of the subject and seizure of 10,000 fentanyl pills and seven kilos of pure fentanyl.

Supervisory Special Agent

Balkan Eurasian La Cosa Nostra Organized Crime Unit
January 2019 - June 2020

Transnational Organized Crime Section
Criminal Investigative Division, FBI Headquarters

Served as Program Manager for the Eurasian Organized Crime Threat for all field and international offices. Provided investigative and operational support for Field Office SSAs, SAs, IAs, and TOC Assistant Legal Attachés. Supervised over 100 transnational investigations involving Eurasian criminal enterprises involved in international money laundering, corruption, extortion, narcotics trafficking, sophisticated fraud, and racketeering. Partnered with Eurasian Organized Crime investigators from over 20 foreign law enforcement agencies to share intelligence.

Special Agent

Eurasian Organized Crime Task Force
March 2011- January 2019

Squad C-24
Organized Crime Branch, New York Field Office

Led numerous successful RICO investigations. Utilized sophisticated investigative techniques and complex CHS development/operations. Selected to serve as Primary Relief Supervisor in October 2017.

- Displayed strong initiative by investigating a simple lead from a foreign partner about NY accountant connected to Russian oligarchs, businessman, and criminal authorities and through relentless effort of obtaining 10 Title IIIs and analyzing of 500 bank accounts, uncovered a \$100 million money laundering scheme, resulting in the conviction of 33 subjects.

- Led an investigation dismantling a Georgian Thief in Law's criminal enterprise through conducting 250 consensual CHS/UC operations and obtaining Title III authority on 13 lines for over two and half years, resulting in the conviction of 50 subjects on RICO charges involving complex cyber fraud, kidnapping, money laundering, extortion, and murder-for-hire schemes.

Acting / Assistant Legal Attaché (TDY)

*Budapest Organized Crime Task Force
June 2014- July 2014*

*Hungary
International Operations Division*

Served as CID ALAT Budapest and assisted field offices with investigative matters while working with the National Hungarian Police. Actively sought engagement with foreign law enforcement partners to infiltrate a complex TOC enterprise, led by Russian Thieves in Law and Eurasian Oligarchs.

Special Agent

*Joint Terrorism Task Force
March 2010- March 2011*

*Squads CT-4, CT-3 and SO-9
Counterterrorism Branch, New York Office*

Investigated CT threat leads and conducted surveillance in the New York AOR relating to Afghanistan, Pakistan, and Northern Africa, in conjunction with task force partners involving the subway and Times Square bombing terror plots, as part of the new Agent rotation.

Special Agent

*FBI Quantico New Agent Academy
October 2009- March 2010*

*Training Division
Quantico, Virginia*

Military Experience**Recruiting Operations Officer (COMTek- Army Civilian Contractor)**

January 2009-October 2009

Army ROTC, 2nd Brigade, Cadet Command
Fort Dix, New Jersey

Responsible for the recruiting, marketing, and advertising for 41 Host Universities in the Northeast Region for Army Reserve Officer Training Corps (ROTC) by analyzing data, conducting historical trend analysis, and managing over \$350,000 in advertising funds.

Army Infantry Officer

March 2006- January 2009

82nd Airborne Division
Fort Liberty, North Carolina, and Iraq

Led as Platoon Leader, Executive Officer, and Acting Company Commander of an Airborne Infantry Company during Operation Iraqi Freedom 07-09. Responsible for overseeing mission readiness, logistics and administration for 159 paratroopers by directing training, maintenance, tactical operations, counterinsurgency operations, and soldier support programs. Selectively chosen over 12 officers to serve as Acting/Company Commander in Iraq for three months when Commander was injured during an explosion, fully maintaining a high tempo of combat operations with high level of success. Led over 50 missions in Iraq responsible for securing major supply routes in the Al Anbar Province to ensure efficient transport of \$60 billion worth of supplies in support of theater wide logistics.

Education

Columbia University- School of International and Public Affairs
Master of Public Administration in Advanced Management and Finance

New York, NY
12/2015

Rutgers College
Bachelor of Science in Political Science and History with a minor in Economics and Military Science

New Brunswick, NJ
05/2005

Certifications and Training

- Instructor for Criminal Enterprise and International Money Laundering Training to Law Enforcement in Cyprus (Oct 2024)
- Overseas Survival Awareness Program (OSAP) Course (Jan 2024)
- New Jersey State Association Chiefs of Police Frontline Supervisor's Leadership Course (May 2023)
- Instructor for Criminal Enterprise and International Money Laundering Training to Law Enforcement in Lithuania, Latvia, Estonia, and Malta (Feb 2021)
- Instructor for TOC East In-Service Training (June 2019)
- Instructor for Transnational Organized Crime Training to Foreign Law Enforcement in Tbilisi, Georgia (Dec 2017)
- Advanced Money Laundering and Asset Forfeiture Course (Feb 2013)
- Ranger School- Army Leadership Course (March 2006)

Awards

- Director's Award Nomination for Outstanding Criminal Investigation -Operation Greek Tragedy (May 2024)
- Federal Law Enforcement Foundation Award Investigation of the Year- Operation Super Gyro (May 2023)
- Exceptional Performance Award, Supervisor in Criminal Enterprise Branch (September 2022)
- Director's Award Nomination for Outstanding Criminal Investigation- Shulaya Et. Al. Investigation (June 2019)
- NYPD Detectives Endowment Association - Investigator of the Year – Shulaya Et. Al. Investigation (December 2018)
- NYPD Detectives Endowment Association - Investigator of the Year – Tokthakhounov Et Al. Investigation (May 2017)

Rating Officials

(Sep 2022 – May 2024) ASAC Michael Ratta, FBI Newark 646-398-2244

(May 2022 – Sep 2022) A/ASAC Joel T. Mack, FBI Newark 973-277-8844

(Jul 2020 – May 2022) ASAC Gregory Takacs (Retired) FBI Newark 203-449-6201

References

FBI SAC James E. Dennehy, 646-438-2074, jedennehy@fbi.gov, Relation: SAC Newark

FBI DAD Joseph R. Rothrock, 760-455-1167, rjrothrock@fbi.gov Relation: Assistant Section Chief of TOC East

Non-FBI Former AUSA Andrew Adams, 734-730-3089, acadams@steptoe.com, Relation: Southern District of New York Chief of Money Laundering and Transnational Criminal Enterprises and Lead Prosecutor for the Attorney General's KleptoCapture Task Force

Disclosure as to OFAC Expert Witness

I. Statement of Opinions, Bases, and Reasons

The Government intends to call Blake Santos, a Senior Enforcement Officer in the Office of Foreign Assets Control (“OFAC”) at the United States Department of Treasury, as a witness at trial. The witness’s testimony will be based upon, inter alia, his academic and professional training and experience, his review of applicable laws, policies, and procedures regarding U.S. trade sanctions, and his review of agency records relevant to the particular transactions involving the defendants that are subject to U.S. trade sanctions. The opinions offered by this witness will not be based on any classified information. Mr. Santos’ qualifications are contained in his *curriculum vitae*, attached hereto as Exhibit D, and a description of the anticipated testimony is set forth below. The Government anticipates that the witness will testify as to the nature of the Russia-related economic sanctions program administered by OFAC, including the following:

Mr. Santos will explain for the jury how a sanction program works. Typically, a sanction program is established via an Executive Order to address a national emergency. Once the President declares a national emergency, the International Emergency Economic Powers Act (“IEEPA”) authorizes the President to impose economic sanctions in order to address the unusual and extraordinary threats related to the emergency. The Secretary of the Treasury, who the President often delegates to implement and enforce sanctions, redelegates the administration of those sanctions within the Treasury Department to OFAC. As Mr. Santos will explain, a sanctions program typically involves prohibitions, exemptions, and licenses, including prohibitions on activity by U.S. persons and activities within or through the United States. In the context of a sanctions program, OFAC has the authority under IEEPA to issue individualized licenses, which authorize certain activity that would otherwise be prohibited. Any party may apply to OFAC for a specific license.

Concerning the Russia sanction program, Mr. Santos will describe the applicable prohibitions, restrictions and requirements regarding transactions subject to U.S. economic and trade sanctions laws and regulations. Mr. Santos will briefly describe IEEPA and the relevant Executive Orders (“E.O.”) issued by United States Presidents, including the following:

- On or about March 6, 2014, the President issued E.O. 13660, declaring a national emergency to deal with the threat posed by the actions and policies of certain persons who had undermined democratic processes and institutions in Ukraine; threatened the peace, security, stability, sovereignty, and territorial integrity of Ukraine; and contributed to the misappropriation of Ukraine’s assets.
- The President subsequently issued three additional Executive Orders that expanded the scope of the national emergency declared in E.O. 13660. Those were E.O. 13661, issued on or about March 16, 2014, E.O. 13662, issued on or about March 20, 2014, and E.O. 13685, issued on or about December 19, 2014. Together, these Executive Orders (collective, the “Russia/Crimea Executive Orders”) authorize, among other things, the imposition of sanctions against persons responsible for or

complicit in certain activities with respect to Ukraine; against officials of the Government of the Russian Federation; against persons operating in the arms or related materiel sector of the Russian Federation; and against individuals and entities operating in the Crimea region of Ukraine.

- The Russia/Crimea Executive Orders also block the property and interests in property of individuals and entities listed in the Annex to E.O. 13661 or of those determined by the U.S. Secretary of the Treasury, after consultation with the U.S. Secretary of State, to meet the criteria in the Russia/Crimea Executive Orders. This results in those individuals and entities being listed on OFAC's Specially Designated Nationals and Blocked Persons List ("SDN List").

Mr. Santos will explain how the Russia sanction program includes prohibitions against transactions conducted by U.S. persons, or occurring in the United States, if they involve transferring, paying, exporting, withdrawing, or otherwise dealing in the property or interests in property of an entity or individual listed on the SDN list. Property and interests in property of an entity that is fifty percent or more owned, individually or in the aggregate, directly or indirectly, by one or more persons whose property and interests in property are blocked are also blocked. The Russia sanction program also prohibits U.S. persons from making any contribution or provisions of funds, goods, or services by, to, or for the benefit of any person or entity on the SDN list. Mr. Santos will also explain how the Russia Sanction program generally prohibits any transaction that evades or avoids, has the purpose of evading or avoiding, or causes a violation of Russia sanctions laws and regulations.

Mr. Santos will also describe OFAC's licensing requirements and application process. He will testify regarding the defendants' licensing history and will establish that none of the following individuals ever obtained a license from OFAC to engage in any transaction involving an individual or entity on the SDN list:

- Vadim Wolfson, a/k/a "Vadim Belyaev"
- Gannon Dean Bond
- Andrey Kostin
- [REDACTED]
- [REDACTED]
- [REDACTED]

Mr. Santos has not previously testified as an expert witness and has not authored a publication in the previous 10 years.

Date: February 28, 2025

**Alan B.
Santos**

Digitally signed by Alan B.
Santos
Date: 2025.02.27 15:50:00
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Blake Santos
Senior Enforcement Officer
OFAC, U.S. Department of the Treasury

EXHIBIT D

Alan Blake Santos

Senior Enforcement Officer, Office of Foreign Assets Control (OFAC)
U.S. Department of the Treasury

Clearance Level: TS/SCI (Active)

Current Employment:

Office of Foreign Assets Control (OFAC) – Washington, D.C.

Senior Enforcement Officer (GS-14) – January 2023 to Present

Senior Compliance Officer (GS-14) – October 2021 to January 2023

Scope of Work: Economic Sanctions, Sanctions Compliance, Financial Investigations, Due Diligence Research, International Affairs, Legal Analysis

Description of Duties:

- Currently serves as a Senior Enforcement Officer within OFAC's Enforcement Division (ENF). OFAC is an agency within the Office of Terrorism and Financial Intelligence (TFI), a Departmental Office (DO) at the U.S. Department of the Treasury.
- Conducts and coordinates comprehensive investigations into domestic and foreign entities, individuals, and financial institutions to determine the egregiousness and magnitude of alleged sanctions violations and recommend appropriate enforcement responses
 - o Consulted OFAC-administered sanctions regulations codified in Title 31 Chapter V of the Code of Federal Regulations, further authorities dictated by targeted Executive Orders, and OFAC's Enforcement guidelines to assess the egregiousness of potential sanctions violations
 - o Represents OFAC, the responsive federal agency for sanctions regulations, in coordination with key interagency enforcement and regulatory partners conducting parallel civil and criminal investigations, to relay key findings and agency stances
 - o Crafts settlement agreements in coordination with relevant financial regulators and enforcement agencies to recommend targeted mitigation measures based on existing sanctions compliance deficiencies, including compliance programs, internal reporting and escalation lines, training expectations, critical compliance-specific assets such as interdiction software, and other key considerations.
- Coordinates with other OFAC divisions and interagency partners to craft and inform sanctions policy
- Participates in outreach events to inform private industry and the general public on U.S. sanctions law

Relevant Prior Employment and Experience:

Deloitte Advisory – Manager

Washington, D.C. – September 2014 to October 2021

Description of Firm Duties:

- Managed and mentored the career development of six more junior Deloitte professionals
- Contributed to numerous proposal efforts in key proposal lead and technical writing capacities in support of Deloitte Advisory's pursuit of winning new business with agencies in the Federal Government
- Supported a variety of clients across a variety of spaces, including clients at the Federal Government, and commercial clients such as Financial Institutions

Description of Duties and Core Clients Served:

• **Committee on Foreign Investment in the United States (CFIUS)**

Washington, D.C. – August 2019 to Present

Scope of Work: Investment Security, National Security Investigations, Open Source Intelligence (OSINT), Financial Investigations, Risk-Based Analysis, International Affairs

- Served as Deloitte Team Lead for the Mitigation & Enforcement and Non-Notified Division within the U.S. Department of the Treasury's CFIUS Office
- Supported the CFIUS mission to review foreign direct investment (FDI) in U.S. companies to ensure that the resulting transactions do not threaten the national security interests of the United States

- Conducted comprehensive risk-based analyses into all elements of a transaction to ensure that any potential threats, vulnerabilities, and consequences have been identified, and any unaddressed national security considerations have been mitigated
- Coordinated with CFIUS member agencies to ensure that all U.S. Government equities are fully addressed; the integrity of the CFIUS process is upheld; and all Congressionally-mandated deadlines are met
-
- **Office of Foreign Assets Control (OFAC) Sanctions Compliance & Evaluation Division (SC&E)**
Washington, D.C. – March 2015 to August 2019
Scope of Work: Economic Sanctions, Sanctions Compliance, Financial Investigations, Due Diligence, International Affairs, Legal Analysis
 - Served as a Compliance Support Analyst within OFAC's Sanctions Compliance & Evaluation (SC&E) Division
 - Conducted comprehensive investigations into domestic and foreign financial institutions to determine the egregiousness and magnitude of alleged sanctions violations and recommend appropriate enforcement responses
 - Reviewed voluntary self-disclosures and block and reject reports submitted by regulated financial institutions and insurance companies to assess potential sanctions violations and recommend appropriate enforcement actions such as voluntary self-disclosures, and block and reject reports in order to determine possible violations of U.S. sanctions regulations
 - Crafted and issued administrative subpoenas to target and compel information from parties critical to determining the nature and severity of potential sanctions violations
 - Coordinated complex, large-scale interagency investigations into potential sanctions violators that resulted in civil monetary penalties amounting to \$53.9 million in FY18 (\$1.3 billion across the interagency)
- **M&T Bank, Wealth Advisory & Institutional Client Services (WISD)**
Buffalo, New York – December 2014 to March 2015
Scope of Work: Know-Your-Customer (KYC), Anti-Money Laundering (AML), AML Compliance
 - Worked as a level two Operational Risk Specialist for M&T Bank's Wealth Advisory and Institutional Client Services (WISD) Risk Management Team
 - Conducted customer investigations and engaged in account remediation measures for M&T customer KYC portfolios to ensure the legitimacy of the bank's high net worth customers, and ensure entity compliance with the bank's KYC expectations

Booz Allen Hamilton – Consultant, May 2013 to July 2014

- Description of Duties and Notable Core Clients Served:

- **Counterterrorism and Criminal Exploitation Unit (CTCEU)**

Arlington, VA – July 2014 to August 2014

Scope of Work: Law Enforcement & Intelligence (LE&I), Homeland Security, Open Source Intelligence (OSINT)

- Worked as a contractor for the U.S. Immigration and Customs Enforcement Agency (ICE)'s Homeland Security Investigations (HSI) at the CTCEU
- Supported mission to combat exploitation of U.S. immigration system by terrorists, criminals, and other national security threats
- Exploited data provided in the Student and Exchange Visitor Information System (SEVIS) in order to refer leads to agents in the field

- **Organized Crime Drug Enforcement Task Force (OCDETF) Fusion Center**

Fairfax, VA – October 2013 to July 2014

Scope of Work: Law Enforcement & Intelligence (LE&I), Financial Intelligence (FININT), Anti-Money Laundering (AML), Open Source Intelligence (OSINT), Performance Metrics, Strategic Planning

- Served as an Intelligence Analyst at the OCDETF Fusion Center (OFC) as a member of the Proactive Asset Targeting Team (PATT)
- Produced over 70 financial intelligence products disseminated to field agents in support of ongoing investigations (DEA, ICE, FBI, IRS, ATF, USMS, USPIS, DOS, DSS, etc.)
- Assisted project managers with production of Monthly Status Report for more senior leadership

Education:

- **James Madison University (JMU)**

Harrisonburg, VA – B.A., International Affairs, Class of 2012

- **University of Jordan (UJ)**

Amman, Jordan – Student, Summer 2011

Scope of Study: Arabic Linguistics, International Travel, English Tutoring (ESL)

- Studied Arabic linguistics in an immersive classroom environment at the Intermediate level
- Tutored English to University of Jordan students at the UJ Language Center

Disclosure as to Expert Witness Christina Sofkos

The Government intends to call Ms. Christina Sofkos, a court-certified Greek-language interpreter, to testify based on her experience and training regarding English-language translations of written communications and documents. Ms. Sofkos recently has not recently testified as an expert. A copy of Ms. Sofkos's *curriculum vitae* is attached hereto as Exhibit E.

Date: February 26, 2025

Christina Sofkos
Christina Sofkos

EXHIBIT E

CHRISTINA SOFKOS
2920 WYNNEWOOD DRIVE, VINELAND, NJ 08361
CSOFKOS@AOL.COM 856-462-9829

QUALIFICATIONS SUMMARY

AOC approved Greek Interpreter with over twenty years of professional experience. Excellent verbal and written fluency in both the Greek and English language. Perform phone interpretation, video transcription as well as simultaneous (SI) and consecutive (CI) interpreting and sight-translation. Adhere to the Interpretation Standard and the Code of Ethics for Interpreters. Experienced in observing tact and discretion for dealing with confidential information. Exceptional social skills and the ability to work with a wide range of people from various backgrounds, using superb customer service and communication skills. Familiar with how to use electronic listening equipment. Clear enunciation and pronunciation. Use of a pleasant and professional voice and polite forms of expression. Authorized by the NJDMV to interpret the certified written test and translate Greek drivers' licenses. Worked for various interpreting companies, as well as, attorneys and medical professionals, in NJ, PA, and DE, NY. Very careful listener to conversations and provide verbatim interpretation. Communicate very well with judges, attorneys, doctors, as well as communicating very well with the Greek community. Ability to work in a fast-paced environment and multi-task. Worked extensively with Greek government, insurance, banking and law in Greece. Greek interpreter for the National Language Service Corps.

Academic Studies

March 2019 Pennsylvania Court Interpreting Orientation. Extensive two-day orientation in PA to acquire certification in Pennsylvania. Emphasis on standards of professional responsibility, criminal procedures, role-play, and memorization practices.

February 2019 Delaware Court Interpreting Orientation. One-day orientation in DE to acquire certification in the Delaware courts. Emphasis on the judicial procedures, court protocol, ethics.

February 2019 Department of Defense, Defense Language Institute for the American Council of Education, Fort Dix, NJ. Defense Language Proficiency Test (DLPT 5). Tested at a 2+, working proficiency, for both reading and listening in the Greek language.

December 2018 Continuing Education Online Seminar for Advanced Consecutive Practice. Online course for consecutive interpretation. Memory-visualization, note taking, intonation and expression.

November 2018 Continuing Education Online Seminar for Advanced Simultaneous Practice. Online course for simultaneous interpretation. Fluid listening concentration, speed and performance.

February 2018 New Jersey Oral Proficiency Interview. Overall score of 12 Superior, which is at a Master level. ACTFL live, telephonic interview. Internationally recognized assessment of speaking proficiency.

August 2012 New Jersey Court Interpreting Orientation. Protocol and policies of court interpreting. Knowledge, skills, abilities to perform as a resisted court interpreter.

May 2012 New Jersey Court Interpreting Spoke English Proficiency Test. Scored at a Master level with an overall score of 80. Sentence mastery, vocabulary, fluency, and pronunciation.

January 2012 New Jersey Court Interpreting Written Exam. Tested at a Master level with 86%. English vocabulary, court-related terms and usage, ethics and professional conduct.

2010 Capella University Masters studies in Child Psychology.
Completed five courses in studies pertaining to child psychology. Child and Adolescent Development,

Educational Psychology, Foundations of Theory and Practice, Lifespan Development, and Ethics and Multicultural Issues of Psychology.

1988-1990 Stockton University, Pomona, NJ Bachelor of Science in Marketing International/Multicultural Studies, Strategic Marketing, Quantitative Analysis, Statistics, etc.

1986-1988 Cumberland County College, Vineland, NJ Associates in Science Business

Professional Experiences

- | | |
|--------------|--|
| 2018-Present | <p>Greek Interpreter for the DE Courts</p> <ul style="list-style-type: none"> • Interpreted via Skype to Greece for a high-profile trial • Interpreted in Superior and Family Courts |
| 2017-Present | <p>Greek Interpreter for the PA Courts</p> <ul style="list-style-type: none"> • Interpreted in Superior, Commonwealth, Common Pleas, and Minor Courts |
| 2012-Present | <p>Greek Interpreter for the NJ Courts</p> <ul style="list-style-type: none"> • Interpreted in Superior Court, Appellate Division, Tax Court, and Municipal • Cases have involved Criminal, Civil, and Family issues • Transcribed video surveillance for a NJ Prosecutor • Interpreted for over a hundred trials |
| 2011-2016 | <p>Founder and Owner, Think Greek Grill & Yogurt Bar, Glassboro, NJ</p> <ul style="list-style-type: none"> • Responsible for all marketing and management of Restaurant • Managed and trained 30 employees, both part time and full time • All food items on the menu were based on my recipes • Responsible for payroll • Design of the menu, décor, advertising • Customer service oriented • Responsible for all social media content • Established rewards program • Accounting • Order all food and drink items for the restaurant • Inventory |
| 2006-Present | <p>Owner fast food seasonal restaurant, To Steki tou Stamati, Lipsi, Greece</p> <ul style="list-style-type: none"> • Re-designed an existing establishment from ground up • Designed the placement of all equipment, electrical and plumbing • Responsible for brining back a tradition of a Village Dance which lasts all night into the next day with approximately 2,000 people in attendance • Management of seasonal employees • Ordering of all food and drink products from other islands • Designed the menu and social media platform |
| 2006-Present | <p>Owner rental property in Greece</p> <ul style="list-style-type: none"> • Manage a four-bedroom home • Coordinate with various travel agencies • Established high end clientele • Management of all financials • Knowledge of all the new laws pertaining to rental property |

- Contact with lawyers, accountants and various other government entities involved in operation a rental property in Greece
- 2004-2005 St. Anthony's Greek Church, Administrative Assistant, Vineland, NJ
- Worked one on one with the Parish Priest
 - Responsible for weekly and monthly newsletters
 - Coordinated needs with the Parish Council
 - Established a record keeping system for the parish
 - Responsible for the calendar for the parish
- 2002-2006 Independent Contractor for Greek Telephonic Interpretation- Part Time
- Received calls from all over the United States
 - Interpreted for hospitals, prisons, court, Doctor's, Attorney's
- 2002-2015 Manager Multi Unit Commercial Property, Vineland, NJ
- Responsible for all the maintenance requirements for the building
 - Renovated the store front and changed the use
 - Dealt with all the inspectors, and city officials on anything pertaining to the change of use issues
 - Managed all the financials for the building
 - Interviewed renters and chose the appropriate tenants
- 2000-Present Independent Contractor Greek interpreter/translator/transcriptions
- Simultaneous Interpretation
 - Consecutive Interpretation
 - Sight Translation
 - Conference Interpreting
 - Translation of various document
 - Transcription of video and audio
- 1997-2002 Founder and Owner, Enwraiture Body Salon, Bryn Mawr, PA
- Designed salon
 - Exclusive rights to product for Montgomery County, PA area as well as Greece and Cyprus
 - Managed a staff of 20 employees
 - Coordinated schedules
 - Marketing, design, advertising
 - Was on all major news outlets, ABC, NBC, and CBS with my demonstration of the product
 - Very high-end clientele

LEADERSHIP

I have had many leadership roles in my career. Owned and operated numerous businesses in the last 25 years. President of Greek school, PTO, and our Greek youth group. Volunteer for various groups in the Greek Church. My extensive travels to Greece for work, have cemented my abilities in the Greek culture. I am an avid reader of both Greek and English books. The love of language is something that I have always been proud of. Perusing continuous studies in the field of interpreting and translation.

Disclosure as to Expert Witness Valentina Bren-Buzil

The Government anticipates that it may call Valentina Bren-Buzil, a court-certified Russian-language interpreter, to testify based on her experience and training regarding English-language translations of written communications and documents. Ms. Bren-Buzil has not testified as an expert in the last four years. A copy of Ms. Bren-Buzil's *curriculum vitae* is attached hereto as Exhibit F.

Date: February 28, 2025

Valentina Bren-Buzil
Valentina Bren-Buzil

EXHIBIT F

Bren-Buzil, Valentina
M.A., World Languages

Interpreter and Translator

15 Muirfield Road
Jackson, NJ 08527, USA

E-mail: Asphodyl@aol.com
Cell: (732) 322-3190

Working Languages:	Russian – A, Ukrainian – A English – B Russian – native Ukrainian - native English – near native
Translation/Interpretation:	Russian-English-Russian Ukrainian-English-Ukrainian

Certification:

- Master level interpreter and translator of Russian and Ukrainian, approved by and registered with the Administrative Office of New Jersey Courts;
- Certified by the Delaware Administrative Office of the Courts, District of Columbia Courts, North Carolina Administrative Office of the Courts, Tennessee Administrative Office of the Courts, Supreme Court of Ohio, Wyoming Judicial Branch, and the Administrative Office of Pennsylvania Courts;
- Registered Interpreter for the New York State Unified Court System.
- Contract Federal Court Interpreter with both Russian and Ukrainian (NY, NJ, PA, CA, and CT);
- Russian translation test score 5/5/5 (highest possible) by the Testing Division of the Washington Language Institute, Washington, DC;
- Russian and Ukrainian DLPT5 score 3 (highest possible);
- ILR skill level in interpretation: Level 5 (Master Professional Performance) (highest possible);
- ATA Certified translator;
- Subject matter expert and a rater for national credentialing program for interpreters providing language expert services to the Consortium for Language Access in the Courts at the National Center for State Courts.

Membership:

- International Association of Professional Translators and Interpreters,
- National Language Service Corp.,
- National Association of Judiciary interpreters and Translators,
- American Translators Association, and
- Delaware Valley Translators Association

Fields of expertise: law, business, finance, politics, medicine, agriculture, literature, religion, history

WORK HISTORY:

1998-present *Free-lance Interpreter and Translator* Simultaneous and consecutive interpretation services to Federal Court, State Department, New Jersey, New York, Delaware, District of Columbia, Vermont, Ohio, Connecticut, and Pennsylvania Judicial systems, DoD, the London Court of International Arbitration, Open World Leadership Center at the Library of Congress, Russian-American Rule of Law Consortium, Department of Energy, PJM Interconnection, NERC, FERC, Professional Fighters League, numerous private companies, individuals, medical institutions, governmental and non-governmental organizations, publishing houses, and law offices, such as Financial Times, Power Play Products, Inc., TUSA, Inc., American Airlines, and many others. Language expert for the Consortium for Language Access in the Courts at the National Center for State Courts. Subject matter expert and a rater for national credentialing program for interpreters. Extensive experience in remote interpreting via Zoom, Webex, Microsoft Teams, etc., both in simultaneous and in consecutive modes.

1994-1998 Global Languages, Inc., New York *Executive Vice-President* Supervised company's activities, hired and fired personnel, conducted daily correspondence, participated in negotiations; developed and designed catalogues, business plans, in charge of quality control, actual interpretation, both consecutive and simultaneous, voice-overs, translation, proofreading and editing.

1991-1995 USI International, New York *Director, Translator, and Interpreter* Supervised daily operations of the Business School in cooperation with Long Island University, Brooklyn, NY. Provided direct control of the school's academic activities and extracurricular program, responsible for hiring and firing translators and interpreters, actual interpreting and translating, conducting negotiations, drafting contracts and agreements, and acting as an international liaison for the company's president.

1991-1993 Zurab Tsereteli's Project "Columbus", New York *Interpreter and Translator*

1991 Refugee Support Agency "Caritas", Lugano, Switzerland *Interpreter and Translator*

1989-1991 *Free-lance Interpreter and Translator* Tel Aviv, Jerusalem Israel Criminal appeal Ivan John Demjanjuk vs the State of Israel, simultaneous interpreter; interpreted for top Israeli officials such as President of Israel Chaim Hertzog, head of the Jewish Agency Simkha Dinitz, President of the World Zionist Council Kaplan, and institutions: Jerusalem Film Festival – simultaneous interpreter; Habima National Theater – translator, proofreader, editor and interpreter; Bar Ilan University – trained a group of Russian <-> English interpreters.

1987-1990 Dialog Agency, Kyiv, Ukraine *Interpreter and Translator, Teacher of English* Interpreting and translating services for numerous companies both in Ukraine and abroad: Premier Global group, USA; Canadian Broadcasting Corporation, Canada; Analekta-Digital, Canada; Scandinavian Interexpo, Sweden, Hobart, Austria at trade shows, exhibitions, negotiations, conferences, training courses, etc. The work also involved teaching English.

1988-1990 Torsteknik AB, Torsaas, Sweden, Kyiv, Ukraine *Interpreter and Translator* Interpreted at trade shows and business negotiations both in Ukraine, Russia and Sweden. Worked at the training course on welding equipment, during testing and installation of robotic welding equipment both in the USSR and in Sweden, translated technical and reference materials, manuals, publications, texts and speeches, provided proofreading and editing, and maintained correspondence.

1985-1989 State Committee for Cinematography *Simultaneous Interpreter and Translator* Interpretation of movies both with and without script, at press conferences, shows, exhibitions and negotiations, voice-overs, translation.

1984-1989 Institute for Plant Physiology and Genetics *Interpreter and Translator* Translated scientific materials and articles, provided proofreading and editing, interpreted at scientific conferences and exhibitions, in charge of international contacts.

1980-1984 Ministry for Housing, Kyiv, Ukraine *Interpreter and Translator* Translation of scientific and technical articles and documents, proofreading, editing, interpreting at conferences, meetings and negotiations.

1977-1980 Bureau of International Youth Tourism "Sputnik", Kyiv, Ukraine *Interpreter and Guide* Interpreted at conferences on international youth movement, worked in international summer camps and as a guide during sightseeing tours all around USSR.

EDUCATION:

Rutgers University, Intensive Simultaneous Interpreting Course and Intensive Course in Court Interpreting
Summer Semester 2007, New Brunswick, NJ, USA

City Courses for Foreign languages, Italian Course 1984-1986 Kyiv, Ukraine
Graduated with high honors

Kyiv National Linguistic University 1975-1980, Kyiv, Ukraine Major – English and French – teaching, translating, interpreting
Graduated Summa Cum Laude

The degree is equivalent to MA in World Languages and Education